AGNIFILO INTRATER

December 17, 2024

VIA ECF

Hon. Arun Subramanian United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

Re: United States v. Combs, 24-cr-542 (AS)

Dear Judge Subramanian:

We write on behalf of Sean Combs to provide the Court with an update regarding the letter we intended to file with the Court yesterday requesting that the Court modify the terms of the Protective Order and to address the government's *Brady* disclosures thus far. (*See* ECF 114 at 1-2.) Yesterday evening, the government made a voluminous discovery production, which the defense will review first before it makes a motion on both topics.

Respectfully submitted,

Marc Agnifilo Teny Geragos AGNIFILO INTRATER 445 Park Ave., 7th Fl. New York, NY 10022 646-205-4350 marc@agilawgroup.com teny@agilawgroup.com

Anthony Ricco Law Office of Anthony L. Ricco 20 Vesey Street New York, NY 10007 (212) 791-3919 tonyricco@aol.com

Alexandra Shapiro Shapiro Arato Bach LLP 1140 Avenue of the Americas, 17th Fl. New York, NY 10036 Hon. Arun Subramanian December 17, 2024 Page 2 of 2

(212) 257-4881 ashapiro@shapiroarato.com

Anna Estevao SHER TREMONTE LLP 90 Broad St., 23rd Fl. New York, NY 10004 (212) 202-2600 aestevao@shertremonte.com

cc: All counsel (via ECF)